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Via ECF
January 16, 2017

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: ***United States v. Tuzman, 15 Cr. 536 (PGG)***

Dear Judge Gardephe:

Creizman LLC represents Omar Amanat in the above-referenced matter. Per Your Honor's order at the January 10 status conference, I write respectfully on behalf of all defense counsel to update the Court concerning our proposed motion schedule.

Counsel for Defendants conferred on January 13 in an effort to provide the Court with a unified proposed briefing schedule. However, Jill Shellow, counsel for Irfan Amanat, represented to us that she is unable to commit to any schedule at this time. We understand that she will submit a separate letter explaining her position.

The Government has stated that it prefers that all parties proceed on the same briefing schedule. We do not object to that request and would similarly prefer that briefing schedules remain consistent for all defendants. However, to the extent the Court directs Omar Amanat and Isaza Tuzman to proceed on a separate track, we jointly propose that motions directed to the Superseding Indictment be submitted by March 31. We also respectfully request two weeks to reply to any opposition brief.

We request that this proposed motions deadline be exclusive of motions regarding any deficiencies in the government's production and other discovery-related issues (including motions relating to Brady material). To date, the government has produced over 1.7 million documents, which the defendants are still in the process of loading onto a platform to allow for effective review, and the government has represented that it will be producing additional

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documents.

The proposed motions deadline takes into consideration (and does not affect) the briefing schedule for Mr. Isaza Tuzman's motion for discovery in connection with its outrageous government conduct defense, which was set during the status conference.

Finally, we do not believe that the new proposed motion deadline requires an alteration in or delay to the current trial date of October 2.

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Eric M. Creizman

Eric M. Creizman

cc: Andrea Griswold and Damian Williams (by ECF)
Reed Brodsky, Jill Shellow, Silvia Serpe and Avi Weitzman (by ECF)